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Attorneys for Petitioner
KEVIN COCHRANE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

KEVIN COCHRANE, an individual,

Petitioner,

v.

OPEN TEXT CORPORATION, a Canadian
corporation and OPEN TEXT INC., a
Delaware corporation,

Respondents.

Case No. 4:15-cv-01234-WHA

**STIPULATION AND [~~PROPOSED~~] ORDER
RE: PETITION TO CONFIRM
ARBITRATION AWARD AND MOTION TO
VACATE ARBITRATION AWARD**

Courtroom: 8 – 19th Floor
Judge: Hon. William Alsup

Pursuant to Civil Local Rules 6-1(a), 6-1(b), 6-2 and 7-12, Petitioner Kevin Cochrane (“Petitioner”) and Respondents Open Text Corporation and Open Text Inc. (“Respondents”) (Petitioner and Respondents, collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, on or about March 16, 2015, Petitioner filed a Petition to Confirm Arbitration Award and Enter Judgment against Respondents (Dkt. No. 1);

WHEREAS, on or about March 30, 2015, Petitioner filed an Amended Petition to Confirm Arbitration Award and Enter Judgment against Respondents (the “Petition”) (Dkt. No. 4);

WHEREAS, on or about April 17, 2015, the Court set an Initial Case Management Conference for June 18, 2015 (the “CMC”) (Dkt. No. 17);

WHEREAS, the Parties have agreed that the last day for Respondents to answer the Petition is April 24, 2015;

WHEREAS, Respondents intend to file an Answer to the Petition (the “Answer”) and a Motion to Vacate the Arbitration Award on April 24, 2015 (the “Motion”);

WHEREAS, the Parties have agreed that Respondents will notice the Motion for hearing on June 11, 2015 at 8:00 a.m. (the “Hearing”);

WHEREAS, the Parties have agreed to modify the standard briefing schedule as set forth below; and

WHEREAS, because the resolution of the issues raised in the Petition and the Motion are expected to fully and finally resolve all issues raised in this proceeding, in the interest of judicial economy, the Parties stipulate and agree and mutually request that the Court advance the CMC from June 18, 2015 to June 11, 2015 at 8:00 a.m., so that it may be held at or immediately following the Hearing.

THEREFORE, IT IS HEREBY STIPULATED by and between the Parties that:

1. The Parties will brief the Motion on the following schedule:

(a) Last day for Respondents to file the Motion: April 24, 2015;

(b) Last day for Petitioner to file opposition to the Motion: May 14, 2015; and

(c) Last day for Respondents to file any reply in support of the Motion:

1 May 28, 2015.

2 2. The Parties mutually request that the Court advance the CMC from June 18, 2015
3 to June 11, 2015, so that it may be held at or immediately following the Hearing on Respondents'
4 Motion.

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6 **IT IS SO STIPULATED.**

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8 Dated: April 24, 2015

SKAGGS FAUCETTE LLP

9
10 /s/ Jeffrey E. Faucette

11 Jeffrey E. Faucette
12 Attorneys for Petitioner KEVEN COCHRANE

13 Dated: April 24, 2015

COOLEY LLP


14
15 /s/ Patrick Gunn

16 Patrick Gunn (172258)
17 Attorneys for Respondents
18 OPEN TEXT CORPORATION and
19 OPEN TEXT Inc.

20 *Filer's Attestation: Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, Patrick Gunn
21 hereby attests that concurrence in the filing of this document has been obtained.*

22 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

23 Dated: April 27, _____, 2015

24 
25 Hon. William Alsup